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February 24, 2023

VIA ECF

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

Re: Cattouse v. MediaCo Holding, Inc., et al.; Civil Case No. 1:22-cv-5860 (JHR)

Dear Judge Rearden:

We represent Plaintiff Amilee Cattouse a/k/a Shaila Scott (“Plaintiff”) in this matter and write jointly with Defendant MediaCo Holding, Inc. (“MediaCo”) and Defendant Emmis Communications Corp. (“Emmis”) pursuant to Your Honor’s Individual Rule 2.E to request an extension of the current deadlines for fact discovery and expert discovery and set forth a briefing schedule governing post-discovery dispositive motions.

The parties have exchanged and responded to interrogatories and requests for production of documents. To date, the parties have search for and produced some documents, but have not completed their productions. Additionally, the parties have been working through some discovery issues, including trying to agree on a confidentiality agreement.

The parties are going through additional electronic document searches. Given that the time period involved in the discovery requests is a six-year window, the parties hope to have those searches completed and documents produced within the next couple of weeks. Once that is done, the parties anticipate needing to work through any discovery disputes and complete depositions. Plaintiff intends to take at least nine depositions. Given the outstanding discovery above, the parties jointly request that the discovery deadline be extended from March 17, 2023 until May 17, 2023 and that the expert discovery deadline be extended from May 16, 2023 until July 17, 2023. The parties further jointly request that the deadline to file any dispositive motions be no later than July 17, 2023, with oppositions due on August 31, 2023, and reply papers due on October 3, 2023. A proposed Revised Scheduling Order is attached.

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The Honorable Jennifer H. Rearden

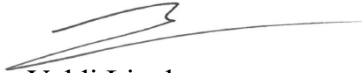
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There have been no prior requests to extend these deadlines. The parties are currently scheduled to appear for a post-discovery video conference on March 23, 2023.

We thank the Court for its time and consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Valdi Licul', with a long horizontal stroke extending to the right.

Valdi Licul

Encl.